

August 4, 2006

06ENV-035

United States Environmental Protection Agency  
Region VII  
901 North 5<sup>th</sup> Street  
Kansas City, Kansas 66101  
Attn: James Aycock

Re: Climax Molybdenum Company  
Fort Madison, Iowa  
RCRA ID No. IAD000222653

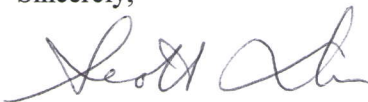
Dear Mr. Aycock:

First, I'd like to introduce myself. My name is Scott Ickes, and I am the new Manager of QA and Environmental Affairs at the Climax Molybdenum facility in Fort Madison, Iowa. I have been in my present position for 6 months.

This letter is in reference to your letter dated July 18, 2006. As a "Conditionally Exempt Small Quantity Generator" ("CESQG") of hazardous waste, we have an obligation to characterize our solid waste to determine whether the solid waste is a hazardous waste (40 C.F.R. § 262.11), but unlike a "Small Quantity Generator" and a "Large Quantity Generator" of hazardous waste, there is no requirement for our facility, to maintain that documentation per 40 C.F.R. § 262.40(c) and 40 C.F.R. § 261.5(g). Based on discussions with facility personnel, we have concluded that the fluorescent lighting in use today is the same lighting in use at the time of your inspection. This lighting, when used, is not a hazardous waste. As a best management practice, then as now, our fluorescent lighting is being stored and shipped off-site to Atec for recycling. Our facility is committed to maintaining compliance with all applicable environmental regulations, for that reason, we have implemented a number of best management practices at the facility, and we were certified to the ISO 14001 standard in December 2005.

We trust that this information will be sufficient to have EPA reissue a Letter of Compliance regarding the items reviewed during the June 24, 2003 inspection. If EPA requires additional clarification, please let me know.

Sincerely,



Scott Ickes  
Manager of QA and Environmental Affairs  
Climax Molybdenum Co.  
(319) 463-2224

467121



RCRA RECORDS

cc: Cal Lundberg – Iowa DNR

REC'D  
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RESP

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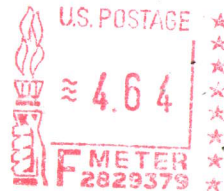
**CLIMAX** MOLYBDENUM COM

A subsidiary of **phelps  
dodge**  
Corporation

P.O. BOX 220 • FORT MADISON, IOWA



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